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November 15, 2022

BY ECF AND EMAIL

Hon. Nicholas G. Garaufis
United States District Court Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Jacob Daskal, 21 Cr. 110 (NGG)*

Dear Judge Garaufis:

We write on behalf of our client, Jacob Daskal, to respectfully request that the Court temporarily modify the conditions of release imposed in this case to allow Mr. Daskal to attend a religious service at a Rockland County Jewish cemetery on November 20, 2022, at 85 North Roosevelt Avenue, Spring Valley, New York. On March 4, 2021, Magistrate Judge Kuo ordered Mr. Daskal's release on a \$4,500,000 secured appearance bond. The court imposed conditions of pretrial supervision, which included home detention. The court included as exceptions to the home confinement condition Mr. Daskal's attending religious services or other activities approved by Pretrial Services. Pretrial Services directed us to seek Court approval for the November 20, 2022 religious service because that service will occur at a cemetery rather than at a synagogue.

The religious service Mr. Daskal seeks to attend relates to the one-year anniversary of his father's death. Jewish custom requires a decedent's family to attend a prayer service at the decedent's grave to mark this anniversary. The prayer service for Mr. Daskal's father is currently scheduled for November 20, 2022, from 11:30 a.m. to 1:00 p.m., at the cemetery's address above. Mr. Daskal also seeks approval to stop at his sister's home, which is approximately a half-mile from the cemetery. This stop will allow Mr. Daskal and members of his family, who are traveling from Brooklyn, to use the bathroom before returning home. Mr. Daskal's sister, who will be attending the grave-side service, resides with her husband. If the instant application is approved, Mr. Daskal will provide Pretrial Services with his sister's address.

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We contacted Pretrial Services Officer Amanda Carlson about the instant modification request. Pretrial Services consents to both the cemetery trip and the stop at the home of Mr. Daskal's sister. Pretrial requests that any Court order approving this modification specifically note that Mr. Daskal shall not be left unattended with any minors. Mr. Daskal does not oppose inclusion of this language in the Court's order.

We also corresponded with Assistant United States Attorney Erin Reid about the instant modification request. Ms. Reid informed us that the government is deferring to Pretrial Services on this matter.

Thank you for your consideration of this matter.

Respectfully submitted,

/S/JIS

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cc: Counsel of record (via ECF)
United States Pretrial Services (via Email)